

# **EXHIBIT “F”**

## Mr. Russins ongoing conduct and exposure

External

ZINSKY/Discovery X



Amy Williamson &lt;awilliamson@awilliamsonlaw.com&gt;

Dec 22, 2022, 11:06 PM



to Benjamin ▾

Hi Ben,

As you know, ever since my client filed suit, Mr. Russin continues to publish threats and use intimidation tactics against her. I have cited to some of them in court pleadings. In response, Judge Horan admonished Mr. Russin and you directly, warning you that he is creating exponential exposure for himself as a result. In fact, she stated that this civil case would be the least of his concerns if he continues his "brash" and "appalling" conduct. What is more, Judge Horan has only seen a small fraction of your client's conduct. Yet, Mr. Russin remains as brash and appalling as ever.

Yesterday, you asked me for an extension of time to produce Mr. Russins discovery responses to include responses to RFPD, interrogatories and RFA. Appreciating the potential volume of information and documents, I agreed to an extension with a new deadline of tomorrow, 12/23.

Ironically enough, tonight Mr. Russin posted the attached photo and message on his instagram page. You will see that he states that his cigar is for a "dear old friend... getting a big batch of presents tomorrow."

I am sure you will continue to take the position that these posts are not about my client but rather another "dear friend" or some other nonsense. When you take a step back and take a look at the timing of all of these posts in conjunction with the developments in the litigation and my clients claims, I feel confident that any juror (let alone Judge Horan) will see right through those defenses.

I will be meeting with my client over the holidays to discuss next steps but out of respect for you, I wanted to give you a heads up that your client's appalling conduct is creating ongoing exposure for him on many levels.

Thanks,  
Amy

10:42



absideon\_achievement 6h  
❖ afternoon surf by elisespresets >

...

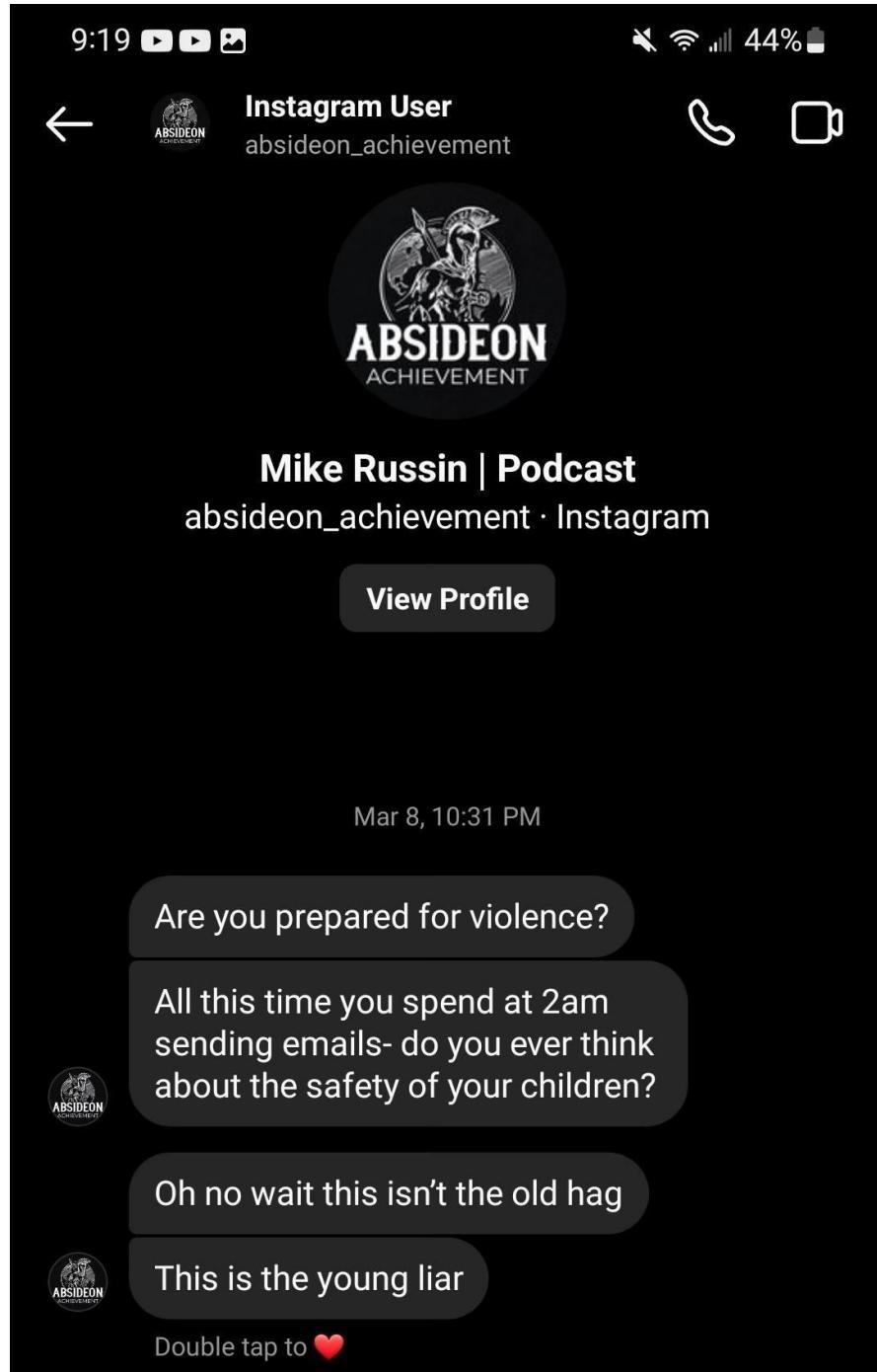


This cigar is for a dear old friend

Who's getting a big batch of presents tomorrow from Santa

It's going to take the whole weekend to soak it all in ❤️

# **EXHIBIT “G”**



# **EXHIBIT “H”**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

RENEE ZINSKY,  
Plaintiff,  
v.

Civil Action No. 2:22-cv-247-MJH  
Judge Horan

MICHAEL RUSSIN, et al.,

Defendant.

JURY TRIAL DEMANDED

**AFFIDAVIT OF MATTHEW MAMROS**

I, Matthew Mamros, hereby state the following:

1. I am a former insurance agent for American Income Life Insurance Company and Arias Agencies.
2. I worked with Plaintiff, Renee Zinsky, and Defendant, Michael Russin.
3. I have firsthand knowledge of facts relevant to this matter.
4. On or about March 8, 2023, Defendant Russin threatened me via Instagram messenger stating as follows:

*Are you prepared for violence?*

...

*All this time you spend at 2am sending emails – do you ever think of the safety of your children?*

...

*Oh no wait this isn't the old hag*

...

*This is the young liar*

I declare under penalty of perjury that the following is true and correct.

Date: 05/02/2023

*Matthew Mamros*

Matthew Mamros

**VIRGINIA ACKNOWLEDGMENT**

State of Virginia \_\_\_\_\_ )  
 County of Roanoke \_\_\_\_\_ )  
 \_\_\_\_\_ )

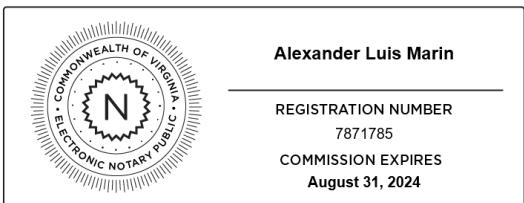
On 05/02/2023 before me, Alexander Luis Marin,  
 Date \_\_\_\_\_ Notary Name \_\_\_\_\_

personally appeared \_\_\_\_\_ Matthew Mamros  
 \_\_\_\_\_ Name(s) of Signer(s)

- personally known to me -- OR --  
 proved to me on the basis of the oath of \_\_\_\_\_ -- OR --  
 proved to me on the basis of satisfactory evidence: \_\_\_\_\_ Driver License  
 \_\_\_\_\_ Type of ID Presented

to be the individual(s) whose name(s) is (are) subscribed to the within instrument, and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies) and by proper authority, and that by his/her/their signature(s) on the instrument, the individual(s), or the person(s) or entity upon behalf of which the individual(s) acted, executed the instrument for the purposes and consideration therein stated.

WITNESS my hand and official seal.



Notary Public Signature: Alexander Luis Marin

Notary Commission Number: 7871785

Notary Commission Expires: 08/31/2024

*Notarized online using audio-video communication*

**DESCRIPTION OF ATTACHED DOCUMENT**

Title or Type of Document: AFFIDAVIT OF MATTHEW MAMROS

Document Date: 05/02/2023 Number of Pages (w/ certificate): 2

Signer(s) Other Than Named Above: \_\_\_\_\_

**Capacity(ies) Claimed by Signer(s)**

Signer's Name: Matthew Mamros

- Corporate Officer Title: \_\_\_\_\_  
 Partner –  Limited  General  
 Individual  Attorney in Fact  
 Trustee  Guardian of Conservator  
 Other: \_\_\_\_\_

Signer Is Representing: \_\_\_\_\_  
Matthew Mamros

**Capacity(ies) Claimed by Signer(s)**

Signer's Name: \_\_\_\_\_

- Corporate Officer Title: \_\_\_\_\_  
 Partner –  Limited  General  
 Individual  Attorney in Fact  
 Trustee  Guardian of Conservator  
 Other: \_\_\_\_\_

Signer Is Representing: \_\_\_\_\_

# **EXHIBIT “I”**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

RENEE ZINSKY,  
Plaintiff,  
v.

MICHAEL RUSSIN, et al.,

Defendant.

Civil Action No. 2:22-cv-247-MJH  
Judge Horan

JURY TRIAL DEMANDED

**AFFIDAVIT OF RENEE ZINSKY**

I, Renee Zinsky, hereby state the following:

1. I am an insurance agent for American Income Life Insurance Company (“AIL”) and Arias Agencies.
2. I have worked for AIL and Arias Agencies from 2019 through present.
3. For a period of ten (10) months, approximately, I worked closely with Matthew Mamros (“Mamros”), and Defendant, Michael Russin (“Russin”).
4. During that time period, Mamros reported to me, and I reported up to Russin.
5. I attended numerous meetings and work-related events with Mamros and Russin during the course and scope of my employment with AIL and Arias Agencies.
6. In that capacity, I frequently witnessed Russin inebriated from alcohol and/or illegal drugs at work.
7. In that capacity, I frequently witnessed Russin acting in an intimidating and threatening manner, often screaming obscenities, insults, and threats of violence toward his subordinates at work.
8. For example, I recall attending one meeting wherein Russin was screaming obscenities and threats as follows:

So when I see these schedules... you would have to shoot me in the fucking face and drag me out of here, my lifeless corpse, to have a schedule like this ... I warned you guys two weeks ago that I was goin old school, did I not? If this scares anyone off, fuck em! I don't give a shit! ... And if you think you're gonna go online and get attorneys ... I've got a quarter mill saved and we will go to battle, for years... and it won't put a fuckin' dent in what I've fuckin' got... And I'm not perfect, Goddamit.

I'm a fuckin' psycho. And anyone with half a fuckin' brain can see that ... I'm a Goddam psycho.

9. On or about June 2020, I witnessed Russin, while inebriated, screaming threats and insults at his wife and hotel workers while acting erratically and violently destroying hotel property via Facebook Live.

10. Since separating from AIL and Arias Agencies, I frequently listen to Russin's podcast, Absideon Achievement.

11. The topics, thoughts, and opinions Russin discusses in his Absideon Achievement podcasts are similar if not identical to many of the topics, thoughts, and opinions that Russin discussed during work meetings which I attended along with Zinsky and other co-workers.

12. Russin's demeanor in his Absideon Achievement podcasts is similar but more subdued and reserved than his demeanor during AIL and Arias Agencies work meetings which I attended along with Zinsky and other co-workers.

13. For example, Russin used more violent threats as to me, Zinsky, and other co-workers in said work meetings than in his Absideon Achievement podcast episodes.

14. Other than behaving in a more subdued and reserved manner for the Absideon Achievement podcast episodes, Russin's personality conveyed in the podcast episodes is identical to Russin's personality that I experienced first-hand while working at AIL and Arias Agencies.

I declare under penalty of perjury that the following is true and correct.

Date: 05/02/2023

Renee Zinsky  
Renee Zinsky

See Attached Jurat

State of Virginia \_\_\_\_\_ )  
 County of Prince William \_\_\_\_\_ )  
 \_\_\_\_\_ )

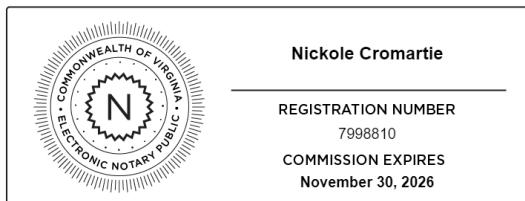
On 05/02/2023, before me, Nickole Cromartie,  
 Date \_\_\_\_\_ Notary Name \_\_\_\_\_

the foregoing instrument was subscribed and sworn to before me by:

Renee Zinsky

*Name of Affiant(s)*

- Personally known to me -- OR --
- Proved to me on the basis of the oath of \_\_\_\_\_ -- OR --  
 Name of Credible Witness \_\_\_\_\_
- Proved to me on the basis of satisfactory evidence: \_\_\_\_\_  
 Pennsylvania Driver License  
 Type of ID Presented \_\_\_\_\_



WITNESS my hand and official seal.

Notary Public Signature: Nickole Cromartie  
 Notary Commission Number: 7998810  
 Notary Commission Expires: 11/30/2026

*Notarized online using audio-video communication*

#### DESCRIPTION OF ATTACHED DOCUMENT

Title or Type of Document: AFFIDAVIT OF RENEE ZINSKY

Document Date: 05/02/2023

Number of Pages (including notarial certificate): 3

# **EXHIBIT “J”**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

RENEE ZINSKY,

Plaintiff,

v.

Civil Action No. 2:22-cv-247-MJH

Judge Horan

MICHAEL RUSSIN, et al.,

Defendant.

JURY TRIAL DEMANDED

**AFFIDAVIT OF MATTHEW MAMROS**

I, Matthew Mamros, hereby state the following:

1. I am a former insurance agent for American Income Life Insurance Company (“AIL”) and Arias Agencies.

2. I worked for AIL and Arias Agencies for approximately ten (10) months, from December 2019 through September 2020.

3. During that time period, I worked with Plaintiff, Renee Zinsky (“Zinsky”), and Defendant, Michael Russin (“Russin”).

4. During that time period, I reported directly to Zinsky, and Zinsky reported up to Russin.

5. I attended numerous meetings and work-related events with Zinsky and Russin during the course and scope of my employment with AIL and Arias Agencies.

6. In that capacity, I frequently witnessed Russin inebriated from alcohol and/or illegal drugs at work.

7. In that capacity, I frequently witnessed Russin acting in an intimidating and threatening manner, often screaming obscenities, insults, and threats of violence toward his subordinates at work.

8. On or about June 2020, I witnessed Russin, while inebriated, screaming threats and insults at his wife and hotel workers while acting erratically and violently destroying hotel property via Facebook Live.

9. Since separating from AIL and Arias Agencies, I frequently listen to Russin’s podcast, Absideon Achievement.

10. To date, I have listened to almost all of Russin's Absideon Achievement podcast episodes.

11. The topics, thoughts, and opinions Russin discusses in his Absideon Achievement podcasts are similar if not identical to many of the topics, thoughts, and opinions that Russin discussed during work meetings which I attended along with Zinsky and other co-workers.

12. Russin's demeanor in his Absideon Achievement podcasts is similar but more subdued and reserved than his demeanor during AIL and Arias Agencies work meetings which I attended along with Zinsky and other co-workers.

13. For example, Russin used more violent threats as to me, Zinsky, and other co-workers in said work meetings than in his Absideon Achievement podcast episodes.

14. Other than behaving in a more subdued and reserved manner for the Absideon Achievement podcast episodes, Russin's personality conveyed in the podcast episodes is identical to Russin's personality that I experienced first-hand while working at AIL and Arias Agencies.

I declare under penalty of perjury that the following is true and correct.

Date: 05/01/2023

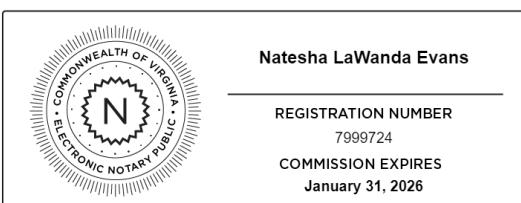
*Matthew Mamros*

Matthew Mamros

Commonwealth of Virginia

County of Prince William

The foregoing instrument was acknowledged before me  
on 05/01/2023 by Matthew Mamros.

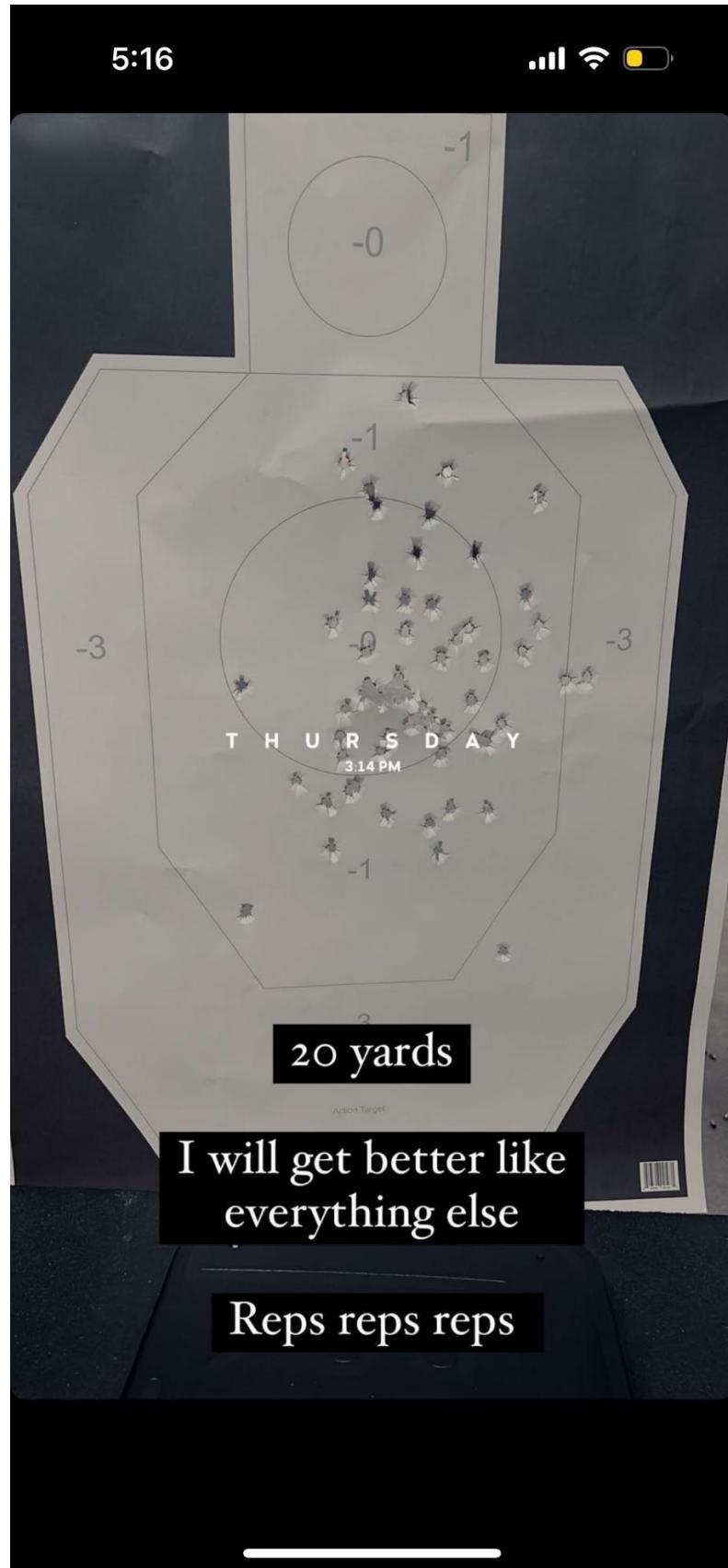


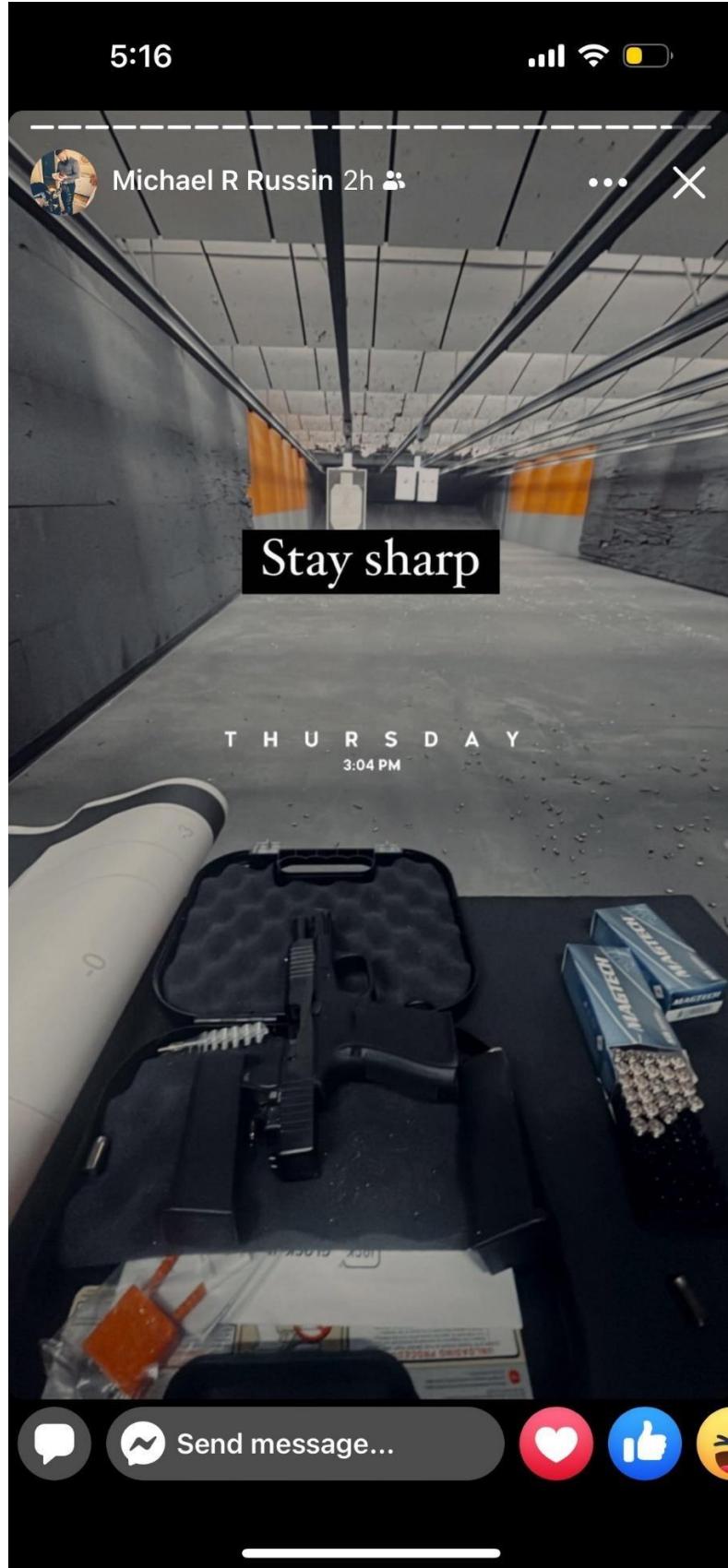
*Natesha LaWanda Evans*  
7999724

My commission expires: 01/31/2026

Notarized online using audio-video communication

# **EXHIBIT “K”**







**Michael R Russin**

Mar 22 ·

•••

One of the very first Bible stories; the story of Cain and Abel, teach us the dangers of weak men.

Weak men are not harmless. They kill and destroy that which threatens them.

This is why good men capable of violence are necessary.

The ones who would say these type of men are not necessary are the first to call upon them in times of crisis and disaster.



21

Like

Comment

Send

3:04 ↗



Michael R Russin

Mar 30 · 🌎

...

Have any of you read into this TikTok bill? It's Orwellian.

Complete control of the entire tech space. If the government deems you a "threat" they can watch you through your ring cameras

Use a website they don't like or say something they don't like online? \$250k fine and 20 years federal.

This isn't democrat v republican, black v white or any of those other stupid games the overlords have tricked you all into playing. They've tricked you into thinking someone with a different skin color or a different political preference is your enemy.

It's THEM. And until some of you dudes grow a set of balls and get ready to take action, your kids and kids' kids will end up living in a totalitarian state, pumped full of hormones, sexualized and medically mutilated.

Yes- I'm talking to YOU. Get up off your ass and start training. Learn how to shoot. Learn how to fight. Learn how to hunt and grow food. I'm telling you all right now you're like lobsters in a pot of lukewarm water

You won't know it's boiling until it's too late



Like



Comment



Share



Write a comment...



Home



Watch



Marketplace



Dating



Notifications



Menu



